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A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS
ALLIANCES IN MEXICO
AND SRI LANKA

September 23, 2019

VIA EMAIL

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Re: **In re Valsartan Products Liability Litigation**, Civ. No. 19-md-2875 (D.N.J.)

Counsel:

Defendant Zhejiang Huahai Pharmaceutical Co., Ltd. proposes the following list of custodians for electronic discovery:

DuaneMorris

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<u>Last Name</u>	<u>First Name</u>	<u>Title</u>
Lin	Linhong (Linda)	Head of Regulatory Affairs
Peng	Wang	Senior Director, Manufacturing, Chuannan API
Peng	Dong	Associate Director, Manufacturing Technology, Chuannan API
Ge	Jucai	Director, Quality Assurance, API Division
Li	Qianming	Director, API Quality Control, Chuannan
Min	Li	VP, Analytical Operation
Wang	Jie	VP, Business Development/API Sales

Sincerely,

/s/ Seth A. Goldberg

Seth A. Goldberg

cc: Jessica Priselac (jpriselac@duanemorris.com)